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Before the  
**Federal Communications Commission**  
Washington, DC 20554

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OCT 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Application by New York Telephone )  
Company (d/b/a Bell Atlantic - New )  
York), Bell Atlantic Communications, )  
Inc., NYNEX Long Distance Company, )  
and Bell Atlantic Global Networks, Inc., )  
for Authorization to Provide In-Region, )  
InterLATA Services in New York )

Docket No. 99-295

**Comments of**  
**Brent Wilkes**  
**National Executive Director**  
**League of United Latin American Citizens**  
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October 19, 1999

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The League of United Latin American Citizens welcomes the opportunity to submit comments in support of New York Telephone Company (d/b/a Bell Atlantic – New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc. (hereinafter referred to as Bell Atlantic) filing requesting FCC authorization to provide in-region, interLATA services in New York. We are the oldest and largest Hispanic organization in the United States with 688 chapters serving communities throughout the country and in Puerto Rico. We believe that Bell Atlantic's entry into the long distance market in the State of New York will open the marketplace to true local, long distance and data services competition benefiting consumers especially Hispanic Americans who use long distance services at a much higher rate than the average American.

The vision of the Telecommunications Act of 1996 was to promote choice and competition in the telecommunications industry. Bell Atlantic's entry into the long distance market will be another positive step in that direction. The Commission's approval of this application will do more than allow Bell Atlantic to provide long distance services in New York. Across-the-board competition will result from Bell Atlantic's entry into the long distance marketplace. Increased competition will not only benefit consumers but also provide for new business opportunities, particularly for Hispanic businesses, to supply services and products to the telecommunications companies offering services in New York.. Other competitors will accelerate their efforts to compete in the local market, as well to meet the challenges presented by a new major competitor for telecommunications services.

We call upon the Commission to quickly approve Bell Atlantic's 271 application. Consumers deserve and demand the simplicity of choice, variety of services at affordable prices, and the commitment to serve the residential customer that Bell Atlantic has made as part of its 271 application. We are concerned with the slow pace with which the Bell Companies have been allowed to compete in the long distance market and we feel that approval of Bell Atlantic's 271 application will be an important first step in the effort to promote competition throughout the industry.

## **I Statement of Interests**

With thousands of members throughout the United States and Puerto Rico, LULAC is the largest and oldest Hispanic Organization in the United States. LULAC advances the economic condition, educational attainment, political influence, health and civil rights of Hispanic Americans through community-based programs operating at more than 688 LULAC councils nationwide. The organization involves and serves all Hispanic nationality groups.

Historically, LULAC has focused heavily on education, civil rights, and employment for Hispanics. LULAC councils provide more than half a million dollars in scholarships to Hispanic students each year, conduct citizenship and voter registration drives, develop low income housing units, conduct youth leadership training programs, and seek to empower the Hispanic community at the local, state and national level.

In addition, the LULAC National Educational Service Centers, LULAC's educational arm, provides counseling services to more than 18,000 Hispanic students per year at sixteen regional centers. SER Jobs for Progress, LULAC's employment arm, provides job skills and literacy training to the Hispanic community through more than forty-eight employment training centers located throughout the United States. The LULAC Corporate Alliance, an advisory board of Fortune 500 companies, fosters stronger partnerships between Corporate America and the Hispanic community.

## **II Benefits of Increased Competition**

Competition for local telephone service in the New York telecommunications marketplace is expanding. Long distance carriers, CLECs and high-speed Internet services providers are offering all forms of telecommunications services throughout the state. The local market is open in New York and Bell Atlantic has met one of the primary requisites for approval to provide long distance services under the 271-checklist process.

Consumers will greatly benefit from Bell Atlantic's entry into the New York market. The competitive pressures which will result from a new significant player in this ever-expanding market will drive all telecommunications companies to become more innovative in the services and products they offer. Competition lowers prices and with Bell Atlantic in the long distance market, services and products will be provided at affordable prices to all consumers.

Bell Atlantic has further committed to provide a full-range of telecommunications services to the residential customers throughout the state. Urban, rural and minority residential customers, as well as small and large businesses, will benefit from the company's commitment to serve all regions of the state with a bundle of services. This commitment on behalf of Bell Atlantic will cause the other telecommunications companies to offer services and products to the residential customer. In anticipation of Bell Atlantic's entry into the long distance market, MCI/WorldCom and others are currently beginning to market local telephone services to residential customers. The dynamic forces of Bell Atlantic's entry into the long distance market will foster competitive advantages, through more services and products at lower costs, for all consumers in New York.

### **III Consumers Demand Real Choices**

The "big three" dominates the long distance marketplace in New York. These companies have focused their attention on offering services to the large volume or business customers. The residential or small volume user has not received the benefits of competition in the current long distance market structure. Of particular concern is that low volume residential customers are being left behind and are the hardest hit by the incumbents' usage requirements and/or fixed fees.

Bell Atlantic has promised to remedy this inequity by providing real choice to consumers. Bell Atlantic has committed to provide a variety of easy to understand calling plans that will fit the needs of all of its customers, from the low volume residential user to

the high volume business customer. Bell Atlantic will be able to offer a bundle of services (local, long distance and data services) to consumers at reasonable prices.

As the local telephone company in New York, Bell Atlantic has a long history of responding to the needs of its customers. This desire to serve will translate into its offering of long distance services, as well. Consumers in all areas of the state will reap the rewards of increased competition and the menu of choices they will receive from Bell Atlantic's entry into the long distance market.

#### **IV. Best Practices**

The commenters urge Bell Atlantic to continue its commitments to consumer protection, universal design, and supplier diversity in its foray into the long distance market. The company's commitment to combat slamming and cramming and to ensure the rights of privacy must be made a core value its long distance company. As competition for local, long distance and data services increase, consumers will need the protections offered against fraud that Bell Atlantic has demonstrated through its current operations.

We also look towards Bell Atlantic to continue its commitment to universal design and making products and services accessible to persons with disabilities. And that the company continue its commitment to use minority vendors to provide products and services. We seek to ensure that all consumers, reap the benefits of the telecommunications revolution now taking place in this nation.

#### **IV Conclusion**

We believe the benefits derived from Bell Atlantic's entry into the long distance market in New York will expand far beyond long distance services and will touch all levels of competition for telecommunications services. We urge the Commission's expeditious approval of Bell Atlantic's New York 271 application.

The Commission's approval of this application will facilitate local, long distance and data services competition in New York and begin to fulfill the goals of the Telecommunications Act of 1996. We look forward to the direct and accelerated competition that will result from Bell Atlantic's entry into the long distance market, the availability of easy to understand choices for telecommunications services at affordable prices, and the company's continued commitment to consumer protection, universal design, and supplier diversity.

The approval of Bell Atlantic's New York 271 application is in the public's interest and is supported fully by the League of United Latin American Citizens.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brent Wilkes", written in a cursive style.

Brent Wilkes  
LULAC National Executive Director